

## **EXHIBIT D**

## **Curriculum Vitae of Robert W. Seiden, Esq.**

Robert W. Seiden, a 61-year-old married father of three, is a lifelong resident of New York State and Managing Partner of Seiden Law LLP.

Robert has been a lawyer for 35 years and started his career as a prosecutor in the Manhattan District Attorney's Office where he served as a trial counsel for 11 years. Robert is admitted to the state and federal courts of New York and has been appointed as a Receiver throughout the United States and the world. Robert works extensively with the United States government, Office of Foreign Asset Control (OFAC), the US Treasury, the SEC, the FBI and the Department of Justice. Robert has extensive experience in China and on behalf of victims of China-related investment frauds.

Robert is the Managing Partner of Seiden Law LLP, a boutique law firm that focuses on plaintiff-side complex commercial litigation and arbitration. Seiden Law is staffed with a multi-lingual and diverse group of experienced professionals handling complex litigation, receiverships, arbitrations and cross-border disputes. Robert is a Fiduciary registered as a Receiver with New York State. Robert has previously received accolades from judges for his work in receivership matters, including from the Honorable Judge Denise Cote in Manhattan federal court and Vice Chancellor Travis Laster in Delaware. Robert has previously served as an executive in the Integrity Monitorship appointed by the New York Port Authority after 9/11 at the site of the Freedom Tower Construction in Manhattan.

Robert began his legal career after graduating New York University with honors and then the Benjamin Cardozo School of Law, as a prosecutor in the Manhattan District Attorney's Office in New York. Robert served from 1988 to 1999 as a senior prosecutor where he investigated and prosecuted cases of white collar and violent crimes. Robert conducted 52 jury trials as lead lawyer and argued multiple appeals. Since entering the private sector in 1999, Robert worked for a litigation law firm and successfully conducted trials and arbitrations. Robert started Seiden Law LLP in 2017 and has grown the firm to a diverse group of lawyers and support staff with a broad range (including several multilingual) of experience and expertise. Robert has been a speaker for the US State Department on issues related to anti-money laundering, sanctions, bank secrecy, financial crimes and terrorist financing and has spoken about receiverships and China investment fraud in various panels around the US and globally.

Robert has been appointed by judges in state and federal courts of New York, Delaware and around the US over thirty (30) times as a Court-Appointed Receiver in matters involving complex issues and disputes, including in New York, Delaware, Nevada, the Cayman Islands, China and Hong Kong. Robert's receiverships have assisted the court and parties in recovering, administering and distributing many millions of dollars for shareholders, creditors and litigants and in resolving protracted disputes in many sectors including mining, energy, technology, agriculture and financial services.

Robert and his work have been published extensively, including his work in China and on behalf of victims of Chinese investment fraud:

- *New York Law Journal* "Application of the Attorney-Client Privilege".  
[http://www.newyorklawjournal.com/PubArticleNY.jsp?id=900005453918&Private\\_Investig ator\\_Application\\_of\\_the\\_AttorneyClient](http://www.newyorklawjournal.com/PubArticleNY.jsp?id=900005453918&Private_Investig ator_Application_of_the_AttorneyClient) (2006)
- *Practicing Law Institute*: [http://www.pli.edu/product\\_files/booksamples/601\\_sample9.pdf](http://www.pli.edu/product_files/booksamples/601_sample9.pdf)
- *Temple University Law School Int'l & Comparative Law Journal*.  
[https://sites.temple.edu/ticlj/files/2019/05/33.1\\_Longley\\_Article1.pdf](https://sites.temple.edu/ticlj/files/2019/05/33.1_Longley_Article1.pdf)  
*Harvard Law Review*:  
[http://www.law.harvard.edu/programs/olin\\_center/papers/pdf/Fried\\_1050.pdf](http://www.law.harvard.edu/programs/olin_center/papers/pdf/Fried_1050.pdf)
- *The New York Times*: <http://www.nytimes.com/2016/03/16/business/dealbook/bounty-hunter-tracks-chinese-companies-that-dupe-investors.html>
- *The Wall Street Journal*: <http://www.wsj.com/articles/court-appointee-chases-and-finds-investor-cash-that-vanished-in-china-1434918506>

Robert served as an elected Trustee of the public-school Board of Education in Port Washington New York for 9 years, from 2002 to 2011, including three (3) years as the School Board President. Robert is the founder and past President of the 501c3 not-for-profit *Port Washington Crisis Relief Team* which was formed after Hurricane Sandy in 2012 after Robert led a large volunteer group that helped thousands of victims of Hurricane Sandy along the Eastern seaboard. For his efforts, Robert was awarded the *Hometown Hero Award* by the Town of North Hempstead and *Volunteer of the Year Award* by Red Cross of Long Island.

Robert also served as a basketball coach at the local Catholic Youth Organization and was a past member of the Board of Directors of Port Washington Senior Citizens Center for 6 years.

Robert has been a volunteer for Red Cross and has been involved since his work on the grounds of the world trade center immediately following the 9/11 attacks.

Robert is the son of a former U.S. Marine who served in active combat in the Korean War. Robert grew up in Brooklyn, New York, attended New York City public schools, Mark Twain Junior High School for the Gifted and Talented in Coney Island and is a graduate of New York University (BA, 1985, with honors) and the Benjamin Cardozo School of Law (JD, 1988) (Dr. Samuel Belkin Scholar and Moot Court Board editor).

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Given the complexity of this matter, The Distribution Administrator will also retain, subject to Court approval, one or more experts in EB-5 immigration law and related matters. Set forth below are brief bios of certain team members.

Proposed Team Members	Background
Robert Seiden, Esq. (Distribution Administrator)	<p>Robert has been a lawyer for 35 years and started his career as a prosecutor in the Manhattan District Attorney's Office where he served as a trial counsel for 11 years. Robert is admitted to the state and federal courts of New York and has been appointed as a Receiver over 30 times throughout the United States and the world. Robert works extensively with the United States government, Office of Foreign Asset Control (OFAC), the SEC, the FBI and the Department of Justice. Robert has extensive experience in China and on behalf of victims of China-related investment frauds.</p> <p>Robert is the Managing Partner of Seiden Law LLP, a boutique law firm that focuses on plaintiff-side complex commercial litigation and arbitration. Seiden Law is staffed with a multi-lingual and diverse group of experienced professionals handling complex litigation, receiverships, arbitrations and cross-border disputes. Robert is a Fiduciary registered as a Receiver with New York State. Robert has previously received accolades from judges for his work in receivership matters, including from the Honorable Judge Denise Cote in Manhattan federal court and Vice Chancellor Travis Laster in Delaware. Robert has previously served as an executive in the Integrity Monitorship appointed by the New York Port Authority after 9/11 at the site of the Freedom Tower Construction in Manhattan.</p>
Tony Zhang, Esq.	<p>Tony Zhang is a bilingual (English-Mandarin) lawyer with sophisticated experience in the areas of EB-5, receivership and litigation. Tony is currently admitted to practice law in New York, New Jersey, and the People's Republic of China. Tony specializes in representing companies and individuals in different jurisdictions before US courts and regulatory agencies such as US Customs and the USCIS. Tony has experience in international litigation in both U.S. courts, P.R.C courts, and well-known arbitration tribunals (e.g., AAA/ICDR and ICC) regarding investment disputes, judgment/arbitration award enforcement and defense, securities litigation, as well as other complex commercial disputes. Tony received his J.D. and LL.M. from St. John's University School of Law in New York City and his LLB from Xi'an University of Science and Technology in China.</p>

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Olivia Huang, Esq.	<p>Olivia Huang is an experienced bi-lingual (English-Mandarin) result-driven lawyer where she represents public and private companies in cross-border litigation, receiverships, securities and investment fraud, and high-stakes complex corporate litigation. Olivia has substantial experience as a litigator and is known for her creativity and ability to communicate effectively with clients and adversaries. Olivia is admitted to practice law in the courts of New York State as well as the Southern District of New York. Certified in International Business Law, she earned her LL.M. degree from Boston University and received an LL.B. degree with a minor in Mathematical Economics from Xiamen University in China, where she was awarded the Guanghua scholarship for the highest GPA of the year and received multiple awards from national moot court competitions.</p>
Allen Glenn, CPA	<p>Allen Glenn is a licensed Certified Public Accountant (CPA) in the State of New York, with extensive auditing, finance, and bookkeeping expertise. He has spent the last decade bringing his accounting background to a variety of industries, ranging from manufacturing and hospitality to real estate and finance. He focuses on managing and streamlining the firm's financial and administrative operations, implementing controls and integrity in the efficient financial systems and coordinating with banks and clients.</p>
Lily Dempsey	<p>Lily Dempsey, an experienced paralegal, provides support on complex client matters. Most recently, she served on the trial team of a high-stakes litigation case where she acted as the main paralegal for plaintiffs' counsel. Ms. Dempsey received her bachelor's degree from American University in Legal Studies and Anthropology where she graduated summa cum laude.</p>